

In their Motion, PNC Bank, N.A. and Columbia Housing SLP Corporation request dismissal under FRCP 12(b)(1) and 12(b)(6) of Movants' claim under Texas state law for the appointment of a receiver to manage the Partnership and for injunctive relief. The deadline for Movants to respond to the Motion is July 14, 2017. However, the issue of which party or parties may have standing to bring a claim on behalf of the Partnership, temporarily or otherwise, is central to the hearing scheduled for July 21, 2017. In order to minimize the number and volume of pleadings related to that core issue, and to alleviate any burden that would be placed on the Court, Movants request the Court to grant an extension of time for Movants to file their response to the Motion to Dismiss and PNC Bank, N.A. and Columbia Housing SLP Corporation agree to Movants' request for the extension of time to respond.

WHEREFORE, Movants pray that the Court grant their Agreed Motion for Extension of Time to Respond to Motion to Dismiss, along with all such other and further relief to which Movants are justly entitled.

Respectfully submitted,

/s/ Kenneth B. Chaiken

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Robert Hoffman, counsel for PNC Bank, National Association and Columbia Housing SLP Corporation, and Mr. Hoffman indicated that he agrees to the relief requested in this Motion.

/s/ Kenneth B. Chaiken

Kenneth B. Chaiken

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record via the Court's electronic filing system on this 14th day of July, 2017.

/s/ Kenneth B. Chaiken

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